functionality" through its electronic gateway. (Albert Decl. ¶ 65). However, he makes no representations as to **when** ECG will be made available to the CLECs or even that when it becomes available, it will be available for both unbundled network elements and resale, including more complex types of resale such as resale of PBX trunks and ISDN. In fact, as pointed out above, the testing Bell claims to be currently undertaking for its OSS systems is for **resale** only.

44. As of now, there is little reason to believe that Bell Atlantic can offer a functional ECG that provides anything like parity in the immediate future. To the best of MCI's knowledge, to date no CLEC has even used Bell Atlantic's electronic gateway in a test environment, much less in a competitive environment. In fact, on March 6, MCI requested a demonstration of ECG and was told that Bell could **not** yet arrange such a demonstration. MCI is certain that the gateway has not been subjected to pre-ordering requests from several CLECs at the same time, thereby proving that it can handle realistic volumes. Consequently, Bell Atlantic must rely on its own internal testing and its experience with ECG in the access environment. However, Bell Atlantic makes no representations regarding the ways in which -- or even whether -- its automated pre-ordering functions have been tested. As for Bell Atlantic's experience in the access environment, not only is that experience extremely limited if MCI's use of ECG is any example, but that experience cannot simply be extrapolated into the local environment. In the local environment, ECG must perform many functions that are completely unnecessary in the access world -- for example, number assignment, feature

checks, and due date selection.

45. At present, therefore, there can be no assurance that these interfaces will work satisfactorily in an actual competitive environment. Indeed, this conclusion seems required by Mr. Albert's own acknowledgment earlier this year that OSS systems cannot be deemed operationally ready prior to "some real work back and forth in the specific geography between the operational employees on both sides, try to get that done before we actually hit the real live customer mode." (Albert, exh. 1, p. 266). In fact, significant work back and forth in the real live customer mode is likely to be needed before a reasonable pre-ordering interface is in place.

Ordering

46. After a CLEC's service representative has determined what phone service is desired by a new customer -- and has determined that that service will be provided by some combination of resale or unbundled network elements -- the representative must transmit the order to Bell Atlantic. Bell Atlantic proposes to use an EDI format for ordering. (Albert Decl. ¶ 67). MCI fully supports Bell Atlantic's planned use of EDI OSS Gateway technology for ordering. EDI is the approved industry solution and should be used by all ILECs.

47. However, Bell Atlantic's facial commitment to provide an EDI ordering process is insufficient to satisfy the checklist requirement for entry into long distance.

Most important, Bell Atlantic does not even assert that its EDI interface is operational. It does not claim that it has ever used its EDI interface to process orders from any CLEC. It does not even claim that it has successfully completed internal testing of its EDI interface, let alone provide any details regarding the types of tests it has completed. It claims only that, "**[i]nitial** development of BA-Pa's EDI is completed and the system is **now being tested**." Albert Decl. ¶ 71. As a result, it is impossible to conclude that Bell Atlantic's EDI interface and downstream business processes will work in a satisfactory manner. It necessarily takes time for carriers to develop internal support systems and coordinate with each other. The critical bottom-line, from an OSS standpoint, is that, Bell Atlantic must have real experience handling orders before anyone can say that its systems work the way they should.

48. MCI's own experiences with Ameritech's newly implemented EDI ordering system emphasize this point. I understand that after Ameritech announced that its EDI interface was operationally ready in Illinois, MCI submitted three test orders for resale service. All three orders encountered significant problems including: 1) the failure to successfully migrate ordered lines until **weeks after** Ameritech had assured MCI that the lines had been migrated; 2) the loss of features during migration -- e.g., the customer had ordered call forwarding but this feature was no longer provided after migration; and 3) the listing of incorrect phone numbers for migrated lines in the Firm Order Confirmation. The simple lesson is this: errors happen unexpectedly. After all, each of these problems occurred despite the extensive internal testing Ameritech

claimed that it performed prior to putting its automated resale interfaces into operation. As I have explained, system implementation ordinarily does reveal system errors, which (hopefully) are then corrected. What is both surprising and disconcerting is Bell Atlantic's disregard of this ordinary de-bugging process -- claiming that its promise to implement interfaces which have not yet even been successfully tested is sufficient to justify its entry into long distance service.

49. Moreover, even if Bell Atlantic had successfully implemented EDI, this would not be sufficient to demonstrate that it had provided the ordering parity required by the Telecommunications Act. The mere fact that Bell Atlantic will use EDI does not provide an answer to the question whether that process conforms to industry standards. First, Bell Atlantic has not said which version of EDI it will use -- the currently approved OBF specifications are embedded in version 7.0, but Ameritech, for example, is using version 5.0, which lacks critical functionality. More important, Bell Atlantic has not committed to employing the industry conventions for feature identification codes. Feature identification codes identify particular services or functions. Even if the ILEC is employing a proper EDI format, a CLEC must employ the correct feature identification code for each service or function it wants to order or the transaction will "error out."

50. There are literally tens of thousands of services and functions that support feature identification codes. In the past, the codes have not been industry standards. Each ILEC, including Bell Atlantic, could, and often did, assign idiosyncratic "USOC" codes to services. Sometimes these codes even varied by states within an ILEC.

51. The thousands of necessary codes make it essential that a CLEC have an easy way of determining the correct codes. For these reasons, Bell Atlantic, like all BOCs, should be expected to implement the recently approved OBF and TCIF industry standard EDI Feature Code Listing. At the very least, it is critical that Bell Atlantic provide CLECs with the same electronic database of USOC codes it uses itself. To date, Bell Atlantic has made no such commitment. Last December, Bell Atlantic's Charlene Sanders indicated that he "believe[d]" there was a **table** of USOC codes being designed. (Sanders, Exh. 1, p. 276). Bell Atlantic says nothing about USOC codes in its current filing.

52. MCI's experience with other BOCs in this regard is not encouraging. My colleagues have told me that Ameritech, for example, has furnished MCI a printed USOC guide organized only by USOC code, not by service or facility. And the service descriptions provided, whether in the guide or on line, are often intolerably cryptic or ambiguous -- for example, two or more codes often correlate with the exact same verbal description of a service or facility. Consequently, MCI has been compelled on many occasions to fax or e-mail particular USOC questions to designated Ameritech representatives. Ameritech's processing of these questions has been poor. On one occasion, for example, Ameritech took almost a month to provide a still-incomplete answer to the question of the proper USOC codes to place specific orders for the resale of trunks. Needless to say, CLECs' lack of satisfactory access to Ameritech's internal USOC database causes significant competitive harms because it creates a substantial

risk that CLECs will input incorrect or out-of-date USOC codes. Bell Atlantic has not demonstrated that it will provide USOC codes in a manner sufficient to avoid these competitive harms.

53. Equally important, Bell Atlantic's proposed ordering process is competitively unsatisfactory for the additional reason that it requires manual intervention by Bell Atlantic service representatives to "input orders into the service order processing system, just as BA-PA representatives do for BA-PA residential and business customer orders." (Albert Decl. ¶ 67). This manual intervention hardly constitutes parity. When a customer orders phone service from Bell Atlantic, the Bell Atlantic representative types the order into the system, which then processes it. When a customer orders phone service from a CLEC, the CLEC representative types the order into a system that interfaces with Bell Atlantic through EDI; the BA representative then retrieves the order and retypes it into the system. This second manual interface inherently creates added error and delay. In fact, the **whole point** of using an electronic interface between carriers is to eliminate the need for manual intervention. Bell Atlantic representatives inevitably will take some time and make some mistakes in re-entering CLEC orders -- a process not required for BA orders. Based on my understanding of MCI's experience with Pacific Bell's manual re-entry system, the added errors and delay are likely to be quite substantial. This has been particularly true with regard to Directory Listings.

54. In addition, with manual re-entry, the BA representative must "eyeball" the

CLEC order to determine whether it contains the necessary information. (Albert, Exh. 1, p. 216). This creates another source of potential human error in processing the information -- a problem that I again understand to have been quite significant with Pacific Bell.

55. Bell Atlantic also does not have an automated process to return an indication of an error to the CLECs. If the BA representative thinks there is a problem with the format of an order, the BA representative will then call or fax an indication of the problem to the CLEC. (Sanders, exh. 1, p.197). Bell Atlantic has been unwilling to make any guarantees as to the time period in which it will send such a fax. (Sanders, exh. 1, p. 197). In addition, if what I have heard regarding MCI's experience with Pacific Bell is any indication, the faxes will frequently contain cryptic error messages that made it extremely difficult for MCI to determine the nature of the ostensible errors. Clearly, when MCI cannot even figure out the communication from the ILEC, this leads to substantial delay, which means that MCI customers are not getting their service converted in a timely manner. If this happens on a consistent basis, customers will lose patience and choose not to switch carriers.

56. Bell Atlantic does recognize the need for a mechanized basis for entry of CLEC orders into the BA system. (Albert Decl. ¶ 67). It makes no promises, however, regarding when such a system will be ready. (Albert Decl. ¶ 67). For resale and unbundled loops, BA merely "hope[s]" to have automatic flow-through available by the "middle or end of the year." (Sanders, exh. 1, p.195). For other unbundled

elements, Mr. Albert states that Bell Atlantic will not be fully automated for several years. (Albert Decl. ¶ 67). This is entirely unacceptable. The manual system creates a significant competitive disadvantage for CLECS. Moreover, an automated system is entirely feasible. Such a system has long been in place in the interexchange context.

Provisioning

57. Provisioning involves the exchange of information between carriers in which one executes a request from the other for a set of products or services with attendant acknowledgments and status reports. There are three provisioning sub-functions, i.e., three types of reports the provisioning ILEC must communicate to the requesting CLEC: firm order confirmation, change in order status ("jeopardy notification"), and order completion. The OBF has already recognized EDI as the correct format for firm order confirmation; it is likely to soon recognize EDI as the correct format for the two other provisioning functions as well.

58. Neither in its statement, in its SGAT, or in Mr. Albert's declaration does Bell Atlantic commit to employing EDI for provisioning. EDI is the OBF approved interface for FOCs and likely OBF interface for jeopardy notification and order completion. In fact, Bell Atlantic explicitly states its intention to employ a **manual** process for jeopardy notification. This is totally unsatisfactory.

59. Jeopardy notification is employed to inform a CLEC that the date for a

customer's service to be turned up has been delayed. Mr. Albert states that Bell Atlantic will notify CLECs by the same process by which Bell notifies its own customers -- for example, by phone. (Albert Decl., ¶ 68). Again, this is **not** parity. A Bell Atlantic customer receives notification after only two steps: 1) the Bell technician notifies service representative; and 2) the Bell service representative notifies customer. In contrast, a CLEC customer will receive notification only after three manual steps: 1) the Bell technician notifies the Bell service representative; 2) the Bell service representative notifies the CLEC; 3) the CLEC notifies the customer. Although an extra step may be needed on an interim basis, it can be avoided with a mechanized interface -- such as the one almost certain to be adopted by the OBF in the next several months. Bell Atlantic should commit to instituting this interface. It is the only way for CLECs to meet customers demand for prompt and accurate information regarding the timely provision of telecommunications service.

Repair & Maintenance

60. Bell Atlantic proposes to use an electronic bonding ("EB") solution, OSI, for repair and maintenance functions. (Albert Decl. ¶ 68). This is the current industry standard specification. Although it will be essential for ILECs to upgrade to a specification (now in development at the ECIC) that allows for true bi-directional,

"agent-to-agent" communication when such interfaces become available, MCI fully supports the interface Bell Atlantic purports to have deployed for the present.

61. In contrast to its position regarding the readiness of its pre-ordering, ordering, and provisioning interfaces, Bell Atlantic states that its repair and maintenance interfaces "**are available** for use by competing local carriers in connection with local service." (Albert Decl. ¶69). While this is a positive development, unfortunately Bell provides little reason to believe that its interfaces will function adequately if ordered. To MCI's knowledge, no CLEC has yet employed these interfaces. This is not surprising given that Bell Atlantic's filing in this case constitutes its first announcement that these interfaces are ready. Moreover, Bell Atlantic does not provide any indication of how it tested these interfaces. Instead, Bell Atlantic bases its view that its EB interface has been sufficiently tested entirely on the fact that it has used that interface successfully "in connection with the provision of access services." In my opinion, Bell Atlantic reads its experience in the access arena for far more than it is worth.

62. The maintenance and repair processes involved in the access arena are, in many respects, quite different from those that will be necessary when competing carriers are using unbundled elements to provide local service. In the latter scenario, but not in the former, the ILEC must, among other things, be able to request authorization to perform deregulated work activities at the CLEC customer's site, and to receive communication of trouble history information from the CLEC.

63. In addition to this general difference between access and local services

regarding the types of communication that must be exchanged, specific problems are presented by the fact that Bell Atlantic, like several other BOCs, uses two trouble handling systems: Work Force Administration (WFA) and Loop Maintenance Operating System (LMOS). When another carrier sends a trouble ticket to Bell Atlantic (via the EB interface), that ticket will be routed to either WFA or LMOS depending entirely on the category of service against which the trouble is written: access services are routed to WFA for resolution, and local services are routed to LMOS. The LMOS system is severely limited in its ability to support cases of trouble sent over Bell Atlantic's OSS interface. These limitations are due to the fact that LMOS has far fewer dedicated fields than WFA for the presentation of information to the Bell Atlantic technician. Consequently, much of the information that an MCI technician enters in an access service ticket destined for Bell Atlantic's WFA system today will be invisible to the Bell Atlantic technician looking at a local service trouble report presented in Bell Atlantic's LMOS system tomorrow. The MCI technician has no view into the LMOS limitations, and thus has no way of knowing what data will be presented to an LMOS user, and what will be lost. However, a Bell Atlantic technician inputting a trouble report does not suffer from the same handicap. Because the Bell Atlantic technician's access to LMOS is not mediated by an OSS gateway, he or she has visibility into the data presentation limitations of LMOS, and therefore will enter no more information than can be presented to a user at a later time. Thus, the level of service LMOS provides to Bell Atlantic's local service customers will be greater than it could provide to MCI's local service customers.

64. For these reasons, the extent to which Bell Atlantic's relative success with its EB interface in exchanging trouble reports for access service is translatable to the local exchange markets remains, at best, uncertain. Whether the operational processes necessary to support maintenance and repair in the context of unbundled network elements used to provide local exchange service will prove satisfactorily coordinated with the EB interface Bell Atlantic uses is a factual question that, at this point, remains unanswered.

Billing

65. The billing function encompasses two discrete sub-functions: daily usage reports that provide the information required to enable CLECs to bill their end users, and monthly bills detailing what the CLEC owes the ILEC. Bell Atlantic states that it will provide daily usage feeds in EMR format via Network Data mover (or CMDS, magnetic tape, or cartridge)[5] for an additional charge. EMR is the appropriate format for daily usage feeds. Once again, however, BA does not indicate that its system is operationally ready. Moreover, the accuracy, timeliness, and accessability of usage feeds are matters of tremendous importance. It is common knowledge that problems which plagued Sprint's billing systems in the late 1980s -- resulting in long-delayed

[5]MCI assumes that BA's intention is to make any of these options available to the CLEC. If, however, BA is merely stating that it will make one of these options available, then its position is unacceptable. Billing information must be available through the Network Data Mover in order to ensure accuracy and preclude delay.

and inaccurate subscriber bills -- cost that carrier tens of millions of dollars in lost revenue and incalculable consumer goodwill.[6] A CLEC that is unable to bill its end-users accurately because of problems with the usage feeds it receives from the ILEC will suffer similar marketplace consequences. Furthermore, these are problems that often are not easily resolved. It took Sprint -- which obviously had every incentive to move fast -- years to correct their systems. If Bell Atlantic (or any BOC) receives interLATA authorization before its billing systems are proven to work properly, it will not have comparable incentives to correct expeditiously any errors that might subsequently arise. In short, because problems with a BOC's usage feeds can prove disastrous to CLECs, and because it will be very difficult for regulators to determine whether a BOC is truly doing all it can to resolve any errors that might arise,[7] it is critical that all billing systems be proven to work in actual competitive use and at meaningful capacity before a BOC is found to have satisfied the requirements of section 271.

66. In addition, Bell Atlantic states that it intends to charge for daily usage feeds but does not state what the charge for those feeds will be. Thus, there is no way to know whether the charge will fulfill the pricing requirements of the Act.

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[6] See, for example, Calvin Sims, Errors Continue to Plague U S Sprint's Billing System, NY Times, at D1 (Mar. 3, 1988).

[7] See Mike Wills, Sorry, Wrong Number: New Wireless Phone Firms Plagued by Billing Problems, Wash. Post, at D1 (Sept. 6, 1996) (noting "that getting the services to market is only half the battle: Getting the numbers right on the monthly bill is more complex and glitch-prone than many companies expect").

67. Bell Atlantic also indicates that it will provide monthly summary bills via NDM. Again, however, Bell merely states that it "**is currently** conducting an operational test to validate the production capabilities of the billing system." (Albert Decl., ¶70). It does not state that its system is ready for commercial use.

68. Even more important, BA does not commit itself to provide its monthly summary bills in CABS (Carrier Access Billing System) BOS format. Indeed, in prior proceedings BA has stated its intention to use the Customer Records Information System (CRIS) format, rather than CABS BOS, for the sale of some unbundled elements. (Bell Atlantic Response to MCI Position Statement in MFS III, p. 6). The CRIS system is designed for end-user billing and is not a system which is adequate for billing of resellers.

69. CABS BOS is the approved OBF standard for resale billing, and appears likely to soon be approved for the billing of unbundled elements as well. CABS is the standard billing format in the interexchange context, and MCI would have to substantially alter its billing system to employ the CRIS system. Such alteration would be particularly difficult because CRIS is not standard from ILEC to ILEC or even across states within an ILEC. Moreover, the CABS BOS format is needed to ensure that CLECs can audit their bills. Unlike CABS, CRIS provides no usage-sensitive data and is entirely inauditable. The bill contains no call detail and does not even specify the billing period.

70. Bell Atlantic has for some time billed MCI in a CRIS format for MCI's own telephone usage. I understand that this system has been riddled with errors. The EDI transaction Set (TS) 811 CRIS Bills that MCI currently receives from Bell Atlantic frequently do not balance. After balancing errors have been pointed out to Bell Atlantic, it has still taken months to fix them. MCI has not received **any** bill data until Bell Atlantic has fixed the problem. This has caused MCI much consternation in managing our internal telephone expenses. Fortunately, MCI does not have to currently rely on Bell's CRIS data to bill end users. If we had to, we would certainly suffer egregious losses. In contrast, MCI has not had similar problems with CABS. For one thing, a CABS system is able to recover data after a problem has been corrected.

III. Performance Standards and Reporting Requirements

71. In order to ensure that Bell Atlantic's OSS in fact operates in a reasonable manner to ensure parity, MCI needs Bell Atlantic to provide reports that enable MCI to evaluate its performance. For example, MCI needs information on how long it takes Bell Atlantic to turn up Centrex service for one of its own customers, for MCI's customers, and for the customers of other CLECs, so that MCI can be assured that it is receiving service at parity. Bell Atlantic has agreed to provide some such information in its contracts with other carriers; a version of this information is appended to Mr.

Albert's Declaration. However, while negotiations between Bell and MCI are ongoing, Bell has not yet agreed to provide sufficient information in a usable form. For example, TCG's contract, and the similar version offered to MCI (which is the same as, or similar to the version appended to Mr. Albert's declaration) aggregates too much data. It only requires Bell Atlantic to provide data that combines the time for provisioning an unbundled loop and an unbundled switch port into one figure. The time for providing 60 lines to a business and one line to a residential customer, and the time for turning up a line and turning up a feature, are also combined. Data on directory assistance and operator assistance are not included at all.

72. In addition, even if MCI is able to ensure parity, MCI must also be able to ensure that Bell provides its services in a **just and reasonable** time frame. In other words, even if Bell Atlantic takes an unreasonably long time to turn up Centrex (or some other) service for its own customers, MCI must be able to ensure that it does not do so for MCI customers. Otherwise, any poor performance by Bell Atlantic will reflect badly on MCI. Unfortunately, however, Bell has flatly refused to agree to any contractual limits on the time frame for performance of any of its obligations. Accordingly, Bell has also not agreed to any penalties for failure to perform in particular time frames.

73. Bell should not be allowed to enter the long distance market until it agrees to provide, and begins to implement, adequate performance standards and reporting requirements. These are critical to ensuring effective competition in the local market.

Bell has complete control over the service it provides to MCI. Because Bell has refused to provide adequate information on its own performance, MCI has no way of ensuring that Bell is providing the same service to MCI as it is to itself. Moreover, Bell's failure to agree to **any** performance standards leaves MCI completely at Bell's mercy with respect to the provision of service. Obviously, the effect on competition is potentially severe.

IV. Directory Assistance

74. Bell Atlantic refuses to provide MCI with directory assistance data in accessible formats so that it can be loaded into MCI's own directory assistance systems. Instead, Bell Atlantic requires MCI to build its directory assistance systems so that it can "dip" into Bell's system and pay Bell for each dip. Bell Atlantic's proposal leaves MCI with no control over the response times of the database and no ability to improve response times as technology advances. Because of the huge volume of dips, each second of database response time costs MCI hundreds of thousands of dollars in labor. Bell Atlantic's proposal also requires MCI to design a new search and retrieval system at a very substantial cost and to train operators on that system. Finally, Bell Atlantic's proposal requires MCI to run two (or more) directory assistance systems -- its own system based on the data MCI receives from incumbent LECs other than Bell Atlantic, and Bell Atlantic's system. MCI would either have to dedicate some of its directory

assistance workforce to Bell Atlantic at the cost of a significant loss of efficiency, or it would have to find a high cost way to toggle between different search and retrieval systems.

75. Bell Atlantic's refusal to provide MCI with data to populate its own directory assistance database is flatly inconsistent with the statute. Section 251(b)(3) requires Bell to provide "nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listing with no unreasonable dialing delays." The FCC concluded that Section 251(b)(3) requires LECs to share subscriber listing information with their competitors in "readily accessible" tape or electronic formats and that such data must be provided in a timely fashion upon request. Second Report and Order, ¶141; Dockets Nos. 96-98; 95-185; 96-8; 02-237 and 94-103, Order No. FCC 96-333 (Aug. 8, 1996) ("FCC Dialing Parity Order"). In addition, Section 251(c)(3) of the Act requires Bell Atlantic to provide nondiscriminatory access to network elements on an unbundled basis at any technically feasible point on rates, terms, and conditions that are just, reasonable, and nondiscriminatory. . . ." Network elements include "subscriber numbers," and "databases" under Section 3(a)(45) of the Act.

V. Resale

76. I would also like to briefly address the issue of resale (checklist item 14). Bell Atlantic asserts that it offers for resale all telecommunications services that it provides

at retail to end users, but it makes no representation that it is today providing services for resale to any CLEC in Pennsylvania. The extent to which BA can effectively provide services for resale is therefore unclear. In MCI's experience, BA is not yet prepared even to provide efficient testing of its ordering systems for resale services. BA initially rejected resale test orders submitted by MCI in February 1997 and indicated that it would not accept the orders until BA and MCI had entered a testing agreement. MCI is still waiting to receive the testing agreement that BA said it would prepare. Several weeks after first requesting the test, MCI is no closer to testing BA's resale offerings and no closer to being able to resell BA services. Although BA has recently given MCI assurances that it is willing to permit testing, it remains to be seen whether testing will actually begin soon.

77. In addition, BA's assertion that it "will negotiate with competing carriers concerning the resale of non-telecommunications services that a competing carrier desires to resell," Albert Decl. para. 60, is contrary to MCI's experience with BA. BA has completely refused to negotiate for the resale of services it identifies as non-telecommunications services, including voice mail and inside wiring. BA has stated that it will not sell either of these services to MCI at retail rates for resale to MCI's end users.

Conclusion

This concludes my declaration.

BEFORE

THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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In re: A-310203F0002 Application of MFS Intelenet of Pennsylvania, Inc.
A-310213F0002 Application of TCG Pittsburgh
A-310236F0002 Application of MCI Metro Access Transmission Services, Inc.
A-310258F0002 Application of Eastern Telelogic Corporation. Further workshop.

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Harrisburg, Pennsylvania
December 4, 1996

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Pages 163 to 283, inclusive

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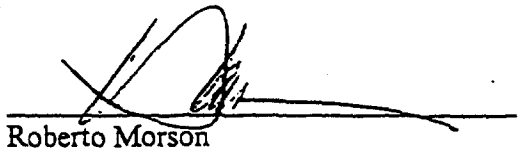
87 South Grant Street
Manheim, Pennsylvania 17545

CERTIFIED COPY

I verify that the foregoing is true and correct to the best of my knowledge and belief. This statement is made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Roberto Morson

BEFORE
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

- - - - -

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Stenographic report of hearing held in Hearing Room 2, North Office Building, Harrisburg, Pennsylvania,

Wednesday,
December 4, 1996
at 10:16 a.m.

- - - - -

BEFORE

MICHAEL C. SCHNIERLE, ADMINISTRATIVE LAW JUDGE

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